

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>SPEEDCAST INTERNATIONAL LIMITED, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	§ § § § § § § §	<b>Chapter 11</b>   <b>Case No. 20-32243 (MI)</b>  <b>(Joint Administration Requested)</b> <b>(Emergency Hearing Requested)</b>
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**DEBTORS' WITNESS AND EXHIBIT LIST  
FOR FIRST DAY HEARING ON APRIL 23, 2020 AT 3:00 P.M. (CST)**

SpeedCast International Limited and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”) file this witness and exhibit list (the “**Witness and Exhibit List**”) for the hearing scheduled for April 23, 2020, at 3:00 p.m. (Prevailing Central Time) before the Honorable Marvin Isgur at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 404, 515 Rusk Avenue, Houston, Texas 77002 (the “**Hearing**”):

**WITNESSES**

The Debtors may call any of the following witnesses at the Hearing:

1. Michael Healy, Chief Restructuring Officer, SpeedCast International;
2. Adam Waldman, Executive Director, Moelis & Company LLC;
3. Robert Jordan, Distressed Analyst/Managing Director, Kurtzman Carson Consultants LLC
4. Any witness called or listed by any other party; and

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kccllc.net/speedcast>. The Debtors’ service address for the purposes of these chapter 11 cases is 4400 S. Sam Houston Parkway East, Houston, Texas 77048.

5. Any rebuttal witnesses.

### **EXHIBITS**

The Debtors may offer into evidence any one or more of the following exhibits:

Debtors Exhibit No.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1.	Declaration of Michael Healy in Support of the Debtors' Chapter 11 Petitions and First Day Relief, dated April 23, 2020 ECF No. 16 (" <b>First Day Declaration</b> ")				
2.	Company's Organizational Chart, attached as "Exhibit A" to the First Day Declaration				
3.	Declaration of Adam Waldman (" <b>Waldman Declaration</b> ") in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief (" <b>DIP Motion</b> "), dated April 23, 2020 [ECF No. 34]				
4.	Unpledged Collateral of Debtor Entities Chart				
5.	Declaration of Robert Jordan (" <b>KCC Declaration</b> ") in Support of Emergency Application of Debtors Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. §§ 105(a), 327, and 503(b), Fed. Bankr. P. 2002(f), 201(a), and 2016, and Local Rule 2014-1 for Appointment of Kurtzman Carson Consultants LLC as Claims, Noticing and Solicitation Agent, dated April 23, 2020 (" <b>KCC Retention Application</b> ") [ECF No. 24], attached as Exhibit B				
6.	Intelsat Agreement, attached to the Critical Vendor Motion, dated April 23, 2020 [ECF No. 21], as Exhibit C				

<b>Debtors Exhibit No.</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
7.	DIP Credit Agreement, attached to DIP Motion [ECF No. 27], as “Exhibit 1” to Exhibit A				
8.	Initial DIP Budget, attached to DIP Motion [ECF No. 27], as “Schedule 1” of Exhibit A				
9.	List of Insurance Programs, attached to the Insurance Motion, dated April 23, 2020 [ECF No. 6], as Exhibit C				
10.	Utilities Services List, attached to the Utilities Motion, dated April 23, 2020 [ECF No. 7], as “Exhibit 1” to Proposed Order, Exhibit A				
11.	Taxing Authorities List, attached the Tax Motion, dated April 23, 2020 [ECF No. 5], as Exhibit 1				
12.	Notice of Commencement, attached to the Consolidated Creditor Matrix, dated April 23, 2020 [ECF No. 9], as “Exhibit 1” to Proposed Order				
13.	Kurtzman Carson Consultants LLC Agreement for Services, dated April 16, 2020, attached to the KCC Retention Application [ECF No. 24], as Exhibit C				
14.	Kurtzman Carson Consultants LLC Fee Structure, attached to the KCC Retention Application [ECF No. 24], as Exhibit D				
15.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				
16.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				
17.	Any exhibit listed by any other party				

The Debtors reserve the right to amend or supplement the Debtors’ Witness and Exhibit List at any time prior to the Hearing.

Dated: April 23, 2020  
Houston, Texas

Respectfully submitted,

/s/ Paul R. Genender  
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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**Certificate of Service**

I hereby certify that on April 23, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' proposed claims, noticing, and solicitation agent.

/s/ Paul R. Genender  
Paul R. Genender